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March 31, 2023

Honorable Gregory H. Woods United States District Judge United States Courthouse 500 Pearl Street – Room 2260 New York, NY 10007-1312

Re: U.S. ex rel. Donohue v. Carranza, et. al. 1:20-CV-5396 (GHW)(SDA)

Dear Judge Woods,

This firm represents the Stamford Board of Education and its superintendent, Dr. Tamu Lucero (collectively "Stamford"), in the above-referenced matter. Consistent with the request made by the NYC DOE (ECF No. 277) and this Court's Individual Rules of Practice, Stamford respectfully requests an extension of time of twenty-one (21) days after issuance of the Second Circuit mandate in this case for filing motions for attorneys' fees. This is the second requested extension of time and counsel for the Plaintiff-Relator has consented to the request.

Very truly yours, Berchem Moses PC

Ryan P. Driscoll

cc: All counsel of record via ECF